



Anita Pettigrew
<anitapet@yahoo.com>
>

01/17/2004 01:53 AM

To: Angela_Reynolds@longbeach.gov
cc: district7@longbeach.gov, wrigleyheights@yahoo.com,
rgutmann@myrealbox.com
Subject: DEIR

To: Angela Reynolds, Acting Environmental Officer
City of Long Beach

Re: Draft Environmental Import Report
SCH 2-022396-1

Dear Ms. Reynolds,

On page 20 of the DEIR, concerning a "Passive Park," it states, "Site remediation would be necessary to the same standards as the proposed project. Impacts Neutral."

F-1

However, on page 19, it states, "...this use [passive park] would not ensure that the site was completely remediated to RWQCB standards."

F-2

Why would the city or anyone else allow the land to remain polluted?

The Wrigley Heights Committee has a document from the RWQCB that says the Oil Operators' North Site needs to be cleaned up whether or not any development occurs. Why would this not also apply to the South Site? Both accepted the same kinds of wastes.

F-3

Under the law, aren't all those who polluted responsible for the cleanup of this site?

F-4

Why does the city refuse to go after these polluters and make them pay for a thorough cleanup? Wouldn't that be the "environmentally superior" alternative?

F-5

Why doesn't this DEIR list all of the companies who polluted? And also what kind of business they were in?

F-6

The Wrigley Heights Committee has some of this information, but it was not in the DEIR. Why not? (We will be glad to give you copies if you don't have them.)

F-7

A recent city council agenda backup item said that the City of Long Beach is still producing oil from the Signal Hill Field. Doesn't that mean that the city itself is still a member of Oil Operators, Inc.?

F-8

If not, how does the city get rid of its wastewater?

F-9

Isn't it a conflict of interest for Long Beach to be determining how polluted the "sludge ponds" are and how well they have to be cleaned up, when the city was, and may still be, part of Oil Operators, Inc.?

F-10

Sincerely,

=====

Anita Pettigrew
3619 Manolia Ave.
Long Beach, CA 90806

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**Anita Pettigrew
Response F**

- F-1 Comment Noted. A passive park would not necessarily need more site remediation than the proposed use. Remediation standards are determined by several factors, one being the direct path of exposure (i.e., via the dirt on the site) and the other the duration of exposure. In any event, the site must be remediated to the satisfaction of the Regional Water Quality Control Board (RWQCB) based on its end use. This makes impacts neutral.
- F-2 A passive park has no economic development value for the current owner of the site. The statement on page 19 of the DEIR simply means that it would take more time to remediate the entire site to RWQCB standards, if there is no economically valuable project to be constructed.
- F-3 The 20 acre site currently evaluated by the DEIR requires that the entire project site be remediated to RWQCB standards.
- F-4 It is the Oil Operator's responsibility to remediate the property. They entered in to a voluntary agreement with the RWQCB in 1998, to do so. In 2002, a Consent Decree was issued that required Oil Operators to begin remediation immediately on Basin 1, with the City's Health and Human Services Department oversight.
- F-5 Opinion, not in the scope of the project DEIR.
- F-6 Comment Noted. This type of information is not a component of the CEQA environmental review. CEQA requires that the environmental document evaluate the potential impacts caused to the environment by the project. A baseline is established for this analysis. The baseline existing conditions are compared to the same conditions with the project.
- F-7 See F-6.
- F-8 See F-6
- F-9 See F-6
- F-10 See F-6



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01/15/2004 10:32 PM

To: Angela_Reynolds@longbeach.gov
cc: district7@longbeach.gov, wrigleyheights@yahoo.groups,
cnjfrogs@yahoo.com, ken.gail@verizon.net
Subject: Draft Environmental Impact Report

To: Angela Reynolds, Acting Environmental Officer
City of Long Beach

Re: Draft Environmental Import Report
SCH 2-022396-1

Date: January 15, 2004

Dear Ms. Reynolds,

The City of Long Beach Self-Storage study dated May, 2003, states that "Projections for future self-storage space demand in the study area (Long Beach, Lakewood, and Signal Hill) range from 205,820 square feet to 771,453 square feet over the next twenty years."

Oil Operators plans on building 516,135 square feet in the tiny neighborhood of Wrigley Heights, which contains only 273 homes. That much self-storage is somewhere between 67 percent and 251 percent of the amount of self-storage projected to be needed in the three cities during the next 20 years!

Since Oil Operators plans to spread the construction out over a number of years, it quite likely that the entire project will never be completed. What happens if the city allows this land to be cleaned up to only self-storage standards, and the full project is never built? Could the remaining land be rezoned to another use, for instance residential, without going back and thoroughly cleaning the property to residential standards?

G-1

G-2

If not, wouldn't the land have to just sit vacant until there was a demand for that much self-storage?

G-3

What would the landowner's options be in such a case?

G-4

Isn't it poor land-use planning to require one neighborhood, and a residential one at that, to possibly handle much of the self-storage demand for three cities over the next 20 years.

G-5

The DEIR doesn't address any of these issues.

And why doesn't the DEIR address the cumulative health impacts of an open-air plant for all of those years, followed by now just doing a partial cleanup and paving over the property?

G-6

Sincerely,

Anita Pettigrew
3619 Magnolia Avenue
Long Beach, CA 90806

**Anita Pettigrew
Response G**

- G-1 If there is excess land to be developed, that development is subject to CEQA review. In addition, the property remaining, will need to be remediated to RWQCB standards for the end use.
- G-2 The property could be rezoned. Rezoing a property is a discretionary action, subject to Planning Commission and City Council purview. If the end use is residential, the site must be remediated to residential standards.
- G-3 Comment Noted. This type of information is not a component of the CEQA environmental review. CEQA requires that the environmental document evaluate the potential impacts caused to the environment by the project, as proposed.
- G-4 Assuming the property is not rezoned, and because the property is held privately, the property owner would continue to be able to build any use allowed or conditionally allowed in the CS zone.
- G-5 The property is currently zoned CS. The EIR analyzes only potential environmental impacts caused by the project. In the CEQA checklist, the Land Use section evaluates the proposed project's compliance with existing land use plans and policy. In this case the proposed project does not conflict with the Title 21 of the Long Beach Zoning Ordinance, as adopted. However, it does not conform with the Long Beach General Plan designation. The applicant must obtain a General Plan amendment, which is a discretionary action, subject to the purview of the Planning Commission and the City Council.
- G-6 Comment Noted. This type of information is not a component of the CEQA environmental review. CEQA requires that the environmental document evaluate the potential impacts caused to the environment by the project, as proposed.

The DEIR does address the issue of remediating the property to end use (in this case self-storage) standards. The Hazards and Hazardous Materials section requires that the site be remediated to RWQCB standards for self-storage.



Anita Pettigrew
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01/17/2004 12:58 AM

To: Angela_Reynolds@longbeach.gov
cc: district7@longbeach.gov, wrigleyheight@yahoo.com,
rgutmann@myrealbox.com
Subject: Draft Environmental Impact Report

To: Angela Reynolds, Acting Environmental Officer
City of Long Beach

Re: Draft Environmental Import Report
SCH 2-022396-1

Dear Ms. Reynolds,

Regarding the traffic impacts as examined in the DEIR:

Why doesn't your report contain, or at least refer to, the numerous letters from residents during the last 5 years regarding the traffic backups caused by the Blue Line crossing of Wardlow Road near Pacific Place?

H-1

I know of at least 20 residents who have written to the City Traffic Engineer asking for some relief (even a grade separation at Wardlow) because eastbound traffic backs up all the way to the approach over the Los Angeles River due to Blue Line trains.

H-2

The studies presented for this project are ludicrous. Originally, in 1998, they said that traffic at the intersection of Wardlow Road and Pacific Place was operating at Level of Service (LOS) "A" during the morning rush hour, and LOS "B" during the evening rush hour.

Since it was already backing up to the river, residents knew this was incorrect. They produced a 1993 letter from then City Traffic Engineer Dick Backus saying the intersection was already operating at LOS "E" or "F" during the evening rush hour.

(Wrigley Heights' Richard Gutmann will be glad to provide you with a copy of the letter. I ask that you include it in the DEIR.)

H-3

The 2002 traffic study by the same company rated this intersection at LOS "D" in the morning, "E" in the evening.

The study arrived at this as explained on page 131 of the DEIR: "the ICU/LOS calculations for the intersection of Pacific Place and Wardlow Road were artificially adjusted to account for signal pre-emption and the delay motorists experience from the Blue Line light rail transit crossing located immediately east of the intersection."

On page 135 the report states "To account for 'a maximum observed delay' of 40 seconds per train during both the AM peak hour and the PM peak hour, an adjustment factor of 0.20 was added to the LOS calculation at Pacific Place and Wardlow Road (0.20=40 seconds per train x 18 trains per hour/3600 seconds

per hour).

This adjustment factor is incorrect. The study says that this was based on "a recent weekday." That weekday apparently was not representative because 40 seconds is far less than my "maximum observed delay."

My neighbor reports timing the delay at this intersection every time he sees a Blue Line train, and says he has never observed a delay of only 40 seconds.

Since the traffic also affects the intersection of Wardlow Road and Magnolia Avenue (backing up way past it), why is there no "adjustment factor" used for that intersection?

This studies simply do not agree with real world experience at these intersections. Besides they change dramatically back and forth. They add an "adjustment factor" apparently as they please. Still staff defends each one as accurate.

H-4

I would ask that the DEIR, as an informational document for those who will be making the decisions, clearly explain what this city defines as "not significant" with respect to new traffic generated by a project.

Decision makers need to know that as defined by Long Beach, an intersection could already be operating at a LOS "F", with traffic backing up for blocks (as it already does at Pacific Place), but as long as the project does not generate 2 percent or more of the intersection's ACTUAL capacity, developers can build forever.

H-5

This is a boon to developers, but is ruining neighborhoods.

Sincerely,

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Anita Pettigrew
3619 Manolia Ave.
Long Beach, CA 90806

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<http://hotjobs.sweepstakes.yahoo.com/signingbonus>

**Antia Pettigrew
Response H**

- H-1 Comment Noted. This type of information is not a component of the CEQA environmental review. CEQA requires that the environmental document evaluate the potential impacts caused to the environment by the project, as proposed.
- H-2 See Comment H-1
- H-3 To account for delays motorists experience by the Blue Line light rail transit crossing located immediately east of the intersection, an adjustment factor of 0.200 was utilized at the intersection of Pacific Place and Wardlow Road. This adjustment factor was based on field observations conducted at this key location during the data collection effort (i.e. collection of traffic counts and field inventory of the project area) and is an accurate representation of the delay caused by the Blue Line light rail transit crossing. This 0.200 adjustment factor, which was added to the ICU/LOS calculations, indicates that the Blue Line light rail transit crossing accounts for 20 percent of the required green time and thus capacity.

Based on projected traffic conditions, the intersection of Pacific Place and Wardlow Road is forecast to operate at acceptable LOS D during the AM peak hour and unacceptable LOS E during the PM peak hour with project traffic, however the proposed self-storage facility project is expected to add no more than 0.8% to the ICU value of this key intersection. The City of Long Beach considers LOS D to be the minimum desirable LOS for all intersections, however if an intersection is operating at unacceptable LOS E or F, the proposed project can increase traffic demand at that intersection by 2% of capacity (ICU increase ≥ 0.02). Based on the City of Long Beach criteria and an ICU increase of 0.8%, the proposed project will not have a significant impact at the intersection of Pacific Place and Wardlow Road. The unacceptable operating conditions of the Pacific Place/Wardlow Road intersection is caused by the Blue Line light rail transit crossing.

It is our understanding that the City of Long Beach is currently working with the Los Angeles County Metropolitan Transportation Authority to implement a "southbound train hold" in order to delay the departure of southbound Blue Line trains from the Wardlow Station if there is a northbound train approaching the Wardlow Station that will actually be arriving at the station within a minute or so of the departure of the southbound train from the station. If there is a northbound train that will be arriving within a minute or so of the departure of the southbound train from the Wardlow Station, the southbound train will be held and then released

at a point in time which will allow both the southbound and northbound trains to cross Wardlow Road concurrently. This procedure will minimize the number of "double pumps" (when the rail crossing gates on Wardlow Rd. e/o Pacific Ave. go down, back up and then back down again within one or two minutes of each other, causing congestion on Wardlow Road).

The southbound train hold will be triggered by a call that will be placed to the Wardlow Station track circuitry as a northbound train is departing the Willow Station. The MTA will be in a position to implement the train hold at the Wardlow Station within approximately two weeks.

- H-4 The intersection of Magnolia Avenue and Wardlow Road is forecast to operate at acceptable LOS C during the AM peak hour and acceptable LOS D during the PM peak hour with the inclusion of project traffic. Although delays are experienced by motorists at this location due to vehicles queuing back along Wardlow Road from the intersection of Pacific Place and Wardlow Road, improvements to increase capacity are not necessary at this location based on the results of intersection capacity analysis. The delay experienced at the intersection of Magnolia Avenue and Wardlow Road is directly related to the Blue Line light rail crossing located immediately east of the intersection of Pacific Place and Wardlow Road and improvements at the intersection of Magnolia Avenue and Wardlow Road will not improve operations along Wardlow Road west of the Blue Line light rail crossing.

Plans by the Los Angeles County Metropolitan Transportation Authority to implement a "southbound train hold" should help alleviate problems at the Magnolia Avenue and Wardlow Road intersection.

- H-5 The threshold for determining significance for potential environmental impacts on the transportation system at signalized intersections is:

An undesirable peak hour Level of Service (LOS) (i.e., LOS E or LOS F) at any of the key intersections is projected and the project increases traffic demand at the key signalized study intersection by 2 percent of capacity (ICU increase greater than or equal to 0.02), causing or worsening LOS E or LOS F.

This threshold is based on the Los Angeles County Congestion Management Program (CMP). However, it is important to note that, the Long Beach threshold is more restrictive than that of the CMP.

In regards to "...developers can build forever.", again the EIR is an informational document that does not either entitle or not entitle a project to be constructed.